

REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed April 25, 2007. Upon entry of the amendments in this response, claims 1 – 21, 52 – 63 remain pending. In particular, Applicants amend claims 1, 4 – 5, 7 – 8, 11 – 13, 15, 17, 20 – 21, 52 – 54, and 56 – 59. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

1. Claim 1 is Allowable Over *Rakib* in view of *Ho*

The Office Action indicates that claim 1 stands rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over U.S. Patent Application Number 2004/0172658 ("*Rakib*") in view of U.S. Patent Number 6,622,307 ("*Ho*"). Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest all of the elements of claim 1. More specifically, claim 1 recites:

A master set top terminal (STT), comprising:

a first tuner, configured to receive a first user input via a first interface, the first tuner further configured to, in response to receiving the first user input, tune a television signal from a received multiplexed signal, into a first tuned television signal;

a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, ***wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT;***

an encoder coupled to the first tuner and configured to receive the first tuned television signal, the encoder further configured to digitally encode the first tuned television signal;

a transmitter coupled to the encoder and configured to transmit the encoded signal to a remote STT to be displayed on a first viewing device;

a receiver configured to receive a first control signal from the remote STT corresponding to a first user input;

a controller coupled to the receiver and configured to accept the first control signal from the receiver, the controller further configured to instruct the first tuner to change the first tuned television signal in response to the first control signal, such that the transmitter transmits a changed encoded signal to the remote STT for display on the first viewing device.

a Radio Frequency (RF) driver coupled to the second tuner, the RF driver configured to facilitate transmission of an independent signal to the second viewing device, the second viewing device being different than the first viewing device.

(Emphasis Added)

Applicants respectfully submit that claim 1, as amended, is allowable over the cited art for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest a "master set top terminal (STT), comprising... a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 1, as amended. More specifically, *Rakib* appears to disclose a "gateway within the genus of the invention which couples any one of a number of different subscriber service data delivery networks which are external to a customer premises to one or more local area networks that deliver digital data from said external networks to one or more devices in said customer premises coupled to said local area networks" (page 4, paragraph [0029] and FIG. 3). However, *Rakib* fails to disclose a "second tuner... **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 1, as amended. For at least this reason, claim 1 as amended, is allowable over the cited art.

Additionally, *Ho* fails to cure the deficiencies of *Rakib*. More specifically, *Ho* appears to disclose "a distribution system...effecting[ing] individualized control of the IRD modules, and thus, control of the television sets, [by] each of the hand-held remote control devices communicat[ing] exclusively with the remote interface unit residing in the same unit as the television set to be controlled" (column 11, lines 14 – 29). Applicants respectfully submit that this is different than the elements of claim 1, as amended, for at least the reason that remote

control devices that communicate exclusively with a device that resides in the same unit as the television to be controlled is different than a dedicated tuner for providing at least one tuned signal for display at a second viewing device. For at least this reason, claim 1 as amended, is allowable over the cited art.

2. **Claim 17 is Allowable Over *Rakib* in view of *Ho***

The Office Action indicates that claim 17 stands rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over U.S. Patent Application Number 2004/0172658 ("*Rakib*") in view of U.S. Patent Number 6,622,307 ("*Ho*"). Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest all of the elements of claim 17. More specifically, claim 17 recites:

A master set top terminal (STT), comprising:

a first tuner, configured to receive a first user input via a first interface, the first tuner further configured to, in response to receiving the first user input, tune a television signal from a received multiplexed signal, into a first tuned television signal, wherein the first tuner is configured for providing at least one tuned signal for display at a first viewing device;

a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, ***wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT;***

a transmitter coupled to the first tuner and configured to transmit the first tuned digital television signal to a remote STT to be displayed on a the first viewing device;

a receiver configured to receive a first control signal from the remote STT corresponding to a user input;

a controller coupled to the receiver and configured to accept the control signal from the receiver, the controller further configured to instruct the first tuner to change the first tuned television signal in response to the first control signal, such that the transmitter transmits the changed first tuned digital television signal to the remote STT for display on the viewing STT within two seconds from the remote STT receiving the user input; and

a Radio Frequency (RF) driver coupled to the second tuner, the RF driver configured to facilitate transmission of an independent signal to the second viewing device, the second viewing device being different than the first viewing device.

(Emphasis Added)

Applicants respectfully submit that claim 17, as amended, is allowable over the cited art for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest a "master set top terminal (STT), comprising... a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 17, as amended. More specifically, *Rakib* appears to disclose a "gateway within the genus of the invention which couples any one of a number of different subscriber service data delivery networks which are external to a customer premises to one or more local area networks that deliver digital data from said external networks to one or more devices in said customer premises coupled to said local area networks" (page 4, paragraph [0029] and FIG. 3). However, *Rakib* fails to disclose a "a second tuner... **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 17, as amended. For at least this reason, claim 17 as amended, is allowable over the cited art.

Additionally, *Ho* fails to cure the deficiencies of *Rakib*. More specifically, *Ho* appears to disclose "a distribution system...effecting[ing] individualized control of the IRD modules, and thus, control of the television sets, [by] each of the hand-held remote control devices communicat[ing] exclusively with the remote interface unit residing in the same unit as the television set to be controlled" (column 11, lines 14 – 29). Applicants respectfully submit that this is different than the elements of claim 17, as amended, for at least the reason that remote control devices that communicate exclusively with a device that resides in the same unit as the television to be controlled is different than a dedicated tuner for providing at least one tuned

signal for display at a second viewing device. For at least this reason, claim 17 as amended, is allowable over the cited art.

3. **Claim 52 is Allowable Over Rakib in view of Ho**

The Office Action indicates that claim 52 stands rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over U.S. Patent Application Number 2004/0172658 ("*Rakib*") in view of U.S. Patent Number 6,622,307 ("*Ho*"). Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest all of the elements of claim 52. More specifically, claim 52 recites:

- A television distribution system comprising:
 - a remote set top terminal (STT) comprising:
 - a first receiver configured to receive an encoded video signal from a master STT;
 - a decoder coupled to the first receiver and configured to translate the encoded video signal into a decoded video signal suitable for a first viewing device;
 - a user interface configured to receive a first user input, the user interface further configured to convert the received first user input to a control signal;
 - a first transmitter coupled to the user interface and configured to send the control signal to the master STT to achieve a change in the encoded video signal;
 - the first receiver configured to receive a change in the encoded video signal responsive to the control signal, wherein the remote STT sends the change to the first viewing device within three seconds of the user input;
 - a master STT comprising:
 - a first tuner, configured to receive the first user input via a first interface, the first tuner further configured to, in response to receiving the first user input, tune a television signal from a received multiplexed signal, into a first tuned television signal;
 - a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, ***wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT;***
 - an encoder coupled to the first tuner, the encoder configured to encode the first tuned television signal;
 - a second transmitter coupled to the output of the encoder, and configured to transmit the encoded signal to the remote STT;

a second receiver configured to receive the control signal from the remote STT corresponding to the first user input;

a controller coupled to the receiver and configured to accept the control signal from the receiver, the controller further configured to instruct the first tuner to change the first tuned television signal in response to the control signal, such that the transmitter transmits a changed encoded signal to the remote STT for display on the first viewing device within three seconds from the remote STT receiving the user input; and

a Radio Frequency (RF) driver coupled to the second tuner, the RF driver configured to facilitate transmission of an independent signal to the second viewing device, the second viewing device being different than the first viewing device.

(Emphasis Added)

Applicants respectfully submit that claim 52, as amended, is allowable over the cited art for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest a "television distribution system comprising... a master STT comprising... a second tuner, configured to receive a second user input via a second interface, the second tuner further configured to, in response to receiving the second user input, tune the television signal from the received multiplexed signal, into a second tuned television signal, **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 52, as amended. More specifically, *Rakib* appears to disclose a "gateway within the genus of the invention which couples any one of a number of different subscriber service data delivery networks which are external to a customer premises to one or more local area networks that deliver digital data from said external networks to one or more devices in said customer premises coupled to said local area networks" (page 4, paragraph [0029] and FIG. 3). However, *Rakib* fails to disclose a "a second tuner... **wherein the second tuner is configured as a dedicated tuner for providing at least one tuned signal for display at a second viewing device, the second viewing device being co-located with the master STT**" as recited in claim 52, as amended. For at least this reason, claim 52 as amended, is allowable over the cited art.

Additionally, *Ho* fails to cure the deficiencies of *Rakib*. More specifically, *Ho* appears to

disclose "a distribution system...effecting[ing] individualized control of the IRD modules, and thus, control of the television sets, [by] each of the hand-held remote control devices communicat[ing] exclusively with the remote interface unit residing in the same unit as the television set to be controlled" (column 11, lines 14 – 29). Applicants respectfully submit that this is different than the elements of claim 52, as amended, for at least the reason that remote control devices that communicate exclusively with a device that resides in the same unit as the television to be controlled is different than a dedicated tuner for providing at least one tuned signal for display at a second viewing device. For at least this reason, claim 52 as amended, is allowable over the cited art.

4. Claims 2 – 7, 16, 18 – 21, 53 – 59, and 63 are Allowable Over *Rakib* in view of *Ho*

The Office Action indicates that claims 2 – 7, 16, 18 – 21, 53 – 59, and 63 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over *Rakib* in view of *Ho*. Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* fails to disclose, teach, or suggest all of the elements of claims 2 – 7, 16, 18 – 21, 53 – 59, and 63. More specifically, dependent claims 2 – 7 and 16 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. Dependent claims 18 – 21 are believed to be allowable for at least the reason that they depend from allowable independent claim 17. Dependent claims 53 – 59 and 63 are believed to be allowable for at least the reason that they depend from allowable independent claim 52. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

5. Claims 8 – 14 are Allowable Over *Rakib* in view of *Ho* and further in view of *Van Der Schaar*

The Office Action indicates that claims 8 – 14 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over *Rakib* in view of *Ho* and further in view of U.S. Patent

Number 6,622,307 ("*Van Der Schaar*"). Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* and *Van Der Schaar* fails to disclose, teach, or suggest all of the elements of claims 8 – 14. More specifically, dependent claims 8 – 14 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

6. **Claims 15 and 60 – 62 are Allowable Over *Rakib* in view of *Ho* and further in view of *Ellis***

The Office Action indicates that claims 15 and 60 – 62 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Rakib* in view of *Ho* and further in view U.S. Patent Application Number 2005/0028208 ("*Ellis*"). Applicants respectfully traverse this rejection for at least the reason that *Rakib* in view of *Ho* and *Ellis* fails to disclose, teach, or suggest all of the elements of claims 15 and 60 – 62. More specifically, dependent claim 15 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 1. Dependent claims 60 – 62 are believed to be allowable for at least the reason that they depend from allowable independent claim 52. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and Official Notice, or statements interpreted similarly, should not be considered well-known for the particular and specific reasons that the claimed combinations are too complex to support such conclusions and because the Office Action does not include specific findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

/afb/

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